

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE: '318 PATENT
INFRINGEMENT LITIGATION

**REDACTED
PUBLIC VERSION**

Civil Action No. 05-356-SLR
(consolidated)

DECLARATION OF CHRISTINA ESTABROOK

I, CHRISTINA ESTABROOK, declare as follows:

1. My name is Christina Estabrook. I am currently employed as the Group Product Director of the Razadyne Brand for Ortho McNeil Neurologics, a division of Ortho-McNeil-Janssen Pharmaceuticals, Inc. The matters stated herein are based on my personal knowledge and on my review of documents I have seen in connection with the performance of my duties.

Professional Background

2. I earned an Associates Degree from Broward Community College, a Bachelors of Arts degree in Chemistry/Biochemistry from the University of Colorado, and an MBA in Pharmaceutical Marketing from St. Joseph's University. Beginning in May 1991, I worked for Wyeth Pharmaceuticals as a Sales Representative. During my time at Wyeth I was promoted at least three times and ultimately became the Senior Product Manager on the Women's Healthcare hormone replacement team working on Premarin and Prempro. On or about April 1, 2004, I joined Ortho-McNeil Pharmaceutical, Inc. as a Regional Business Director leading the Southeast Region sales

team. In May of 2005, I joined the marketing team as Group Product Director for the Razadyne Brand for Ortho-McNeil Neurologics, Inc.

3. As the Group Product Director of the Razadyne brand, I am responsible for the overall performance of the products marketed as Razadyne. My responsibilities include, among other things: (1) development of the brand positioning and messaging used in marketing, promoting, and selling the product; (2) opinion leader development; (3) determining the appropriate marketing mix¹ and use of resources based on market and brand potential; (4) developing business and strategic plans, including forecasts; (5) working with our licensing partner; and (6) managing the U.S. lifecycle of the products. I also have input into contracts and pricing strategies. Consequently, I am responsible for both the top line (net trade sales²) and bottom line (profitability) of Razadyne IR and Razadyne ER. Finally, I was directly involved in the worldwide marketing and sales efforts of the Razadyne brand until early 2008.

4. In January of 2006, I spoke at the Biotech and Healthcare Conference put on by the Kellogg School of Management, Northwestern University, on the evolution of sales forces. I have also been a guest speaker at St. Joseph's University on the topic of pharmaceutical marketing.

¹ A marketing mix is defined as the types of tools and vehicles utilized to communicate and promote to your customer base. This also includes distribution channels, contracting, and pricing.

² :

REDACTED

Current Marketing of Razadyne

5. Razadyne is currently marketed in the United States by Ortho-McNeil Neurologics, a division of Ortho-McNeil-Janssen Pharmaceuticals, Inc. Prior to Ortho-McNeil-Janssen Pharmaceuticals, Inc., Razadyne was marketed in the United States by Janssen, L.P and Ortho-McNeil Neurologics, Inc. Ortho-McNeil-Janssen Pharmaceuticals, Inc., is a wholly-owned subsidiary of Johnson & Johnson.

6. Razadyne is currently marketed in the US in two formulations: an immediate release formulation (Razadyne IR) and an extended release formulation (Razadyne ER). I am responsible for both products. In this declaration, when I refer to Razadyne, I refer to Razadyne IR.

REDACTED

7. Currently, there is a 30-month stay on regulatory approval of generic versions of Razadyne. The stay expires at midnight on August 28, 2008.

8. Assuming no generic competitor enters the market at-risk, Razadyne IR is expected to earn an additional :

REDACTED

. The revenue can be directly traced to the '318 patent, a method of using galantamine hydrobromide for the treatment of Alzheimer's Disease.

9. At this time, Ortho-McNeil-Janssen Pharmaceuticals, Inc. has

REDACTED

REDACTED

10.

REDACTED

11.

REDACTED

12. Currently, there is no marketed FDA-approved generic version of Razadyne.

REDACTED

Currently, there are seven generic manufacturers waiting for expedited entry into the market. Ten generic drug manufacturers that have sought approval to manufacture a generic version of Razadyne have agreed to wait until the expiration of the '318 patent.

13.

REDACTED

REDACTED

14. I declare under the penalty of perjury that the foregoing is true and correct.

Executed on August 27th, 2008

Christina Estabrook

Christina Estabrook